

According to Schneider, during this initial conversation O'Connor briefly outlined the Hudson casino issue, describing it as a dispute involving Indians O'Connor & Hannan represented who were trying to stop other Indians financed by a private company from converting a dog track into a casino. O'Connor told Schneider either that he had already talked with Ickes about the matter, or that he had been trying unsuccessfully to talk to Ickes about it; Schneider's recollection on this point has varied.<sup>310</sup> Schneider now says that O'Connor's request was that Schneider tell Ickes to talk to O'Connor.<sup>311</sup>

On May 16, 1995, Schneider learned that the President would be attending a DNC reception at the Mayflower Hotel in Washington, and Schneider went to the event, uninvited. Schneider knew Ickes from past campaign and White House events, and saw him at the reception. Schneider approached Ickes and engaged him in a short conversation about the presidential campaign. According to Schneider, he then briefed Ickes about the Hudson issue,

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<sup>310</sup>During his civil deposition, Schneider testified, "I'm pretty certain he said that he'd spoken with Harold Ickes and that – he related sort of Ickes' response, which was sort of he'd look into it type of response." *Four Feathers v. City of Hudson* Deposition of Thomas Schneider, Sept. 8, 1997, at 11 (hereinafter "Schneider *Four Feathers* Dep."). In a deposition before the House Committee on Government Reform and Oversight, Schneider testified that O'Connor "explained to me that he had had conversations with Harold Ickes in the White House asking for his help and that Harold Ickes had told him that he would look into it." House Committee on Government Reform and Oversight Deposition of Thomas Schneider, Dec. 10, 1997 (hereinafter "Schneider House Dep."). During this investigation, Schneider was "not sure" if O'Connor had previously talked to Ickes. OIC Interview of Thomas Schneider, April 15, 1999, at 3 (hereinafter "OIC Schneider Int.").

<sup>311</sup>In his civil deposition, Schneider described a somewhat different dimension to the request. Explaining that O'Connor was concerned that he was being "blow[n]-off" by Ickes, Schneider said O'Connor "asked if I could, knowing that I know a lot of people in the White House and sort of – I mean we'd talked about this within the firm – if I would be willing to raise the issue in order to try to get the White House to actually look into it." Schneider *Four Feathers* Dep. at 13-14.